

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

PRECIOUS HOLDER, NOELLE HOGAN,
DANNY ELDRED, DARWIN WATTS,
and CHERYL WATTS, individually and on
behalf of all other similarly situated,

Plaintiffs,

Civil Action: 1:10-cv-752

v.

HON. GORDON J. QUIST

ENBRIDGE ENERGY, L.P.,
ENBRIDGE PIPELINES LAKEHEAD, L.L.C.
ENBRIDGE PIPELINES (WISCONSIN) INC.,

Defendants,

**PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS'
FEES AND EXPENSES TO CO-LEAD PLAINTIFFS' COUNSEL**

Plaintiffs, by and through their undersigned counsel, respectfully move this Court for an Order: (1) awarding Co-Lead Plaintiffs' Counsel attorneys' fees; and (2) reimbursing Co-Lead Plaintiffs' Counsel's litigation expenses in the total amount of \$1,850,000 for fees and expenses as set forth the Settlement Agreement. In support of their Motion, Plaintiffs rely upon the attached Brief and Exhibits.¹

WHEREFORE, Plaintiffs, on behalf of themselves and the proposed Class, respectfully request that the Court grant Plaintiffs' Motion for An Award of Attorneys' Fees and Expenses

¹ Contemporaneously with the filing of this Motion, Plaintiffs have also filed a Motion for Final Approval of the Class Action Settlement and Approval of the Incentive Awards and Brief in Support ("Final Approval Brief"). Plaintiffs incorporate by reference their Final Approval Brief.

To Co-Lead Plaintiffs' Counsel in the amount of \$1,850,000, and enter the proposed Final Order attached to this Brief.

Respectfully submitted,

Fink + Associates Law
Co-Lead Counsel for Plaintiffs

/s/ David H. Fink
David H. Fink (P28235)
Darryl Bressack (P67820)
100 West Long Lake Road; Suite 111
Bloomfield Hills, MI 48304
dfink@finkandassociateslaw.com
(248) 971-2500

The Miller Law Firm, P.C.
Co-Lead Counsel for Plaintiffs

/s/ Ann L. Miller
Ann L. Miller (P43578)
E. Powell Miller (P39487)
950 West University Drive; Suite 350
Rochester, MI 48307
alm@millerlawpc.com
(248) 841-2200

Hertz Schram PC
Co-Lead Counsel for Plaintiffs

/s/ Elizabeth C. Thomson
Patricia A. Stamler (P35905)
Elizabeth C. Thomson (P53579)
1760 South Telegraph Road; Suite 300
Bloomfield Hills, MI 48302
pstamler@hertzshcram.com
(248) 335-5000

Liddle & Dubin PC
Co-Lead Counsel for Plaintiffs

/s/ Laura L. Sheets
Laura L. Sheets (P63270)
Steven D. Liddle (P45110)
975 E. Jefferson Ave.
Detroit, MI 48207
lsheets@mlclassaction.com
(313) 392-0015

Dated: April 6, 2015